

DECLARACIÓN DE R.M.

Yo, R.M., declaro lo siguiente:

1. Soy Demandante en la causa a la que se hace referencia. Tengo conocimiento de los siguientes hechos y, si me convocan como testigo, podría testificar y lo haría de manera competente.

2. Soy la madre de una hija de 15 años, S.Q. Estoy muy unida a mi hija y ella y yo siempre habíamos estado juntas antes de venir a los Estados Unidos.

3. S.Q. y yo huimos de El Salvador por miedo a mi ex marido. Mi ex marido, un ex oficial militar con conexiones con la policía local, me amenazó con matarme en varias ocasiones. Temo que si regreso a El Salvador, mi ex marido me encontrará y me matará.

4. También tengo miedo de las pandillas en El Salvador. Un pandillero quería lastimar a mi hija y después de enfrentarlo, me dijeron que la pandilla iba a hacer daño a mi hija. Las pandillas lo resuelven todo matando, y si regresamos a El Salvador, me temo que las pandillas nos matarán a las dos.

5. El 18 de mayo de 2018 o alrededor de esa fecha, S.Q. y yo ingresamos en los Estados Unidos por la frontera al sur de Texas. Tenía entendido que la forma correcta de ingresar al país era presentarse a los oficiales y solicitar asilo. Por lo tanto, S.Q. y yo esperamos debajo de un árbol por aproximadamente 30 minutos hasta que vimos una patrulla. Hicimos señales a la patrulla y pedimos ayuda. El oficial nos preguntó si estábamos bien, y luego nos preguntó por nuestro nombre, edad y el lugar donde nacimos. La conversación se realizó sin problemas, y nos metimos en la parte trasera del vehículo.

6. Nos llevaron a una estación, donde nos separaron de inmediato y a mí me llevaron a una oficina. No me dieron ninguna explicación de adónde se llevaban a mi hija, y tuve un momento de pánico. Estaba distraída mirando alrededor para ver si podía encontrar a mi hija. Los oficiales me hacían preguntas, pero no podía concentrarme porque estaba tratando de ver dónde estaba mi hija. No recuerdo mis respuestas a sus preguntas. Solo asentía con la cabeza mientras con la vista recorría la habitación y miraba por la ventana en busca de mi hija. Por un

momento, pude verla afuera de la ventana. Sonreí y la saludé, y fingí estar bien, para que no tuviera miedo.

7. Despues de verla, me volví hacia los oficiales. Comenzaron a gritarme, diciendo que me iban a deportar sin mi hija y que me castigarían por exponer a mi hija a un viaje tan duro. Empecé a llorar. Un oficial dijo: “Puedes agradecérselo a Trump”. Sentí que me estaban presionando para que firmara documentos de deportación gritándome y preguntándome varias veces: “¿Estás lista para firmar tus documentos de deportación?” Me dijeron que iría a la cárcel si no firmaba.

8. No firmé los documentos de deportación porque no iba a dejar a mi hija atrás. Dos de los oficiales se estaban riendo de mí mientras lloraba. Yo estaba asustada y desorientada. Al final del interrogatorio, después de no firmar mis documentos de deportación, un oficial me preguntó si tenía miedo de regresar a mi país. Dije que sí. Esta fue la última pregunta que me hicieron.

9. Despues, me llevaron a una parte diferente de la instalación, que llaman “La Hielera” porque está muy fría. Despues de haber estado en “La Hielera”, me llevaron a otra parte de la instalación. Esta otra parte se llamaba “La Perrera” porque sus celdas se parecen a las de una perrera; jaulas cerradas por cercas de alambre tejido. Las condiciones eran horribles. Estaba apretada en una jaula con al menos de 40 a 50 mujeres más. Nos sentamos en el piso hombro con hombro. No había camas ni esteras, ni almohadas, ni mantas. Nos dieron hojas de papel y nos tumbamos en el suelo para dormir. No había suficiente espacio en el piso para que todas se acostaran sin tocarse. Cubríamos todo el piso. Cuando alguien necesitaba usar el baño, tenía que caminar sobre las personas y dar un golpecito en el hombro a las personas para hacer un pequeño camino. Había solo un inodoro en la jaula, pero no estaba encerrado. Las mujeres se ponían de pie para crear una pared humana para darle privacidad a la persona cuando usaba el baño.

10. Las luces estaban prendidas día y noche, lo que hacía casi imposible dormir. Perdí la noción del tiempo porque no había reloj ni ventanas. No sabía cuándo había pasado un día.

Cuando una mujer preguntó por la hora, un guardia se burló de ella y le preguntó: “¿Por qué? ¿Tienes una cita o algo?”

11. La comida que nos dieron estaba repugnante. Dos veces al día, nos traían dos trozos de pan empapado y una pieza congelada de lo que parecía jamón, y un cartón de jugo. Todas teníamos mucha hambre. Para humillarnos, los guardias abrían la puerta de la jaula y nos lanzaban galletas saladas. Esto causaba mucho caos. Las mujeres se apresuraban a recoger las galletas del suelo, y los guardias se reían. Estaba sentada cerca de la puerta al lado del oficial, así que tendí la mano por una galleta. El guardia me dijo: “¿Quieres un tratamiento de cinco estrellas?” Entonces arrojó las galletas para que yo las comiera del piso, diciendo: “Aquí está tu servicio de habitaciones”.

12. No se nos permitió ducharnos ni cepillarnos los dientes durante cuatro días. No nos dieron una muda de ropa, y vestíamos la ropa con la que habíamos llegado. Muchas mujeres tenían la ropa mojada porque habían cruzado el río para llegar a los Estados Unidos. Hacía tanto frío que su ropa mojada se puso rígida.

13. Desde mi jaula, pude ver a mi hija en la jaula de los niños. Un día, después de alimentar a los niños, el guardia dejó abierta la jaula de los niños. Cuando el guardia se alejaba, mi hija salió de la jaula y me trajo una botella de agua pequeña. Nuestros dedos se tocaron a través de la cerca de alambre tejido. Le dije que todo iba a salir bien y que la quería mucho. Esta fue la última vez que toqué a mi hija.

14. Alrededor del 21 de mayo de 2018, comparecí ante un juez para mi proceso penal. Estaba en la sala del tribunal junto con otros 50 detenidos. Nos sentamos en filas de bancos frente al juez. Teníamos grilletes y esposas, y nos dieron audífonos para la interpretación. Antes de que comenzara el proceso, un hombre con traje se puso de pie y nos aconsejó a todos que nos declaráramos culpables. Dijo que si nos declarábamos culpables, obtendríamos una sentencia menor. Creo que este hombre podía ser un abogado, pero no estoy segura. A todos los detenidos ante el juez se les hicieron las mismas preguntas, y todos nos declaramos culpables. Había

aproximadamente 25 personas por delante de mí, y respondí lo mismo que ellos porque pensé que era lo que se suponía que debía hacer. No entendí las consecuencias de declararme culpable.

15. Después de mi proceso penal, me subieron a un autobús. No dijeron adónde nos llevaban, pero más tarde supe que nos dirigíamos a Laredo, Texas. Todos estaban preguntando por sus hijos. Un guardia gritó: “¡Dejad de preguntar por vuestros hijos!” Todas las mujeres estaban asustadas. Yo tenía pánico porque mi hija no estaba en el autobús y no quería que me la quitaran. Empecé a llorar desconsoladamente porque me di cuenta de que estaba siendo separada de mi hija y que no nos reuniríamos.

16. Durante los siguientes tres días, estaba inconsolable. Creo que solo dormí una hora por noche. No podía comer. No podía hablar con nadie. Todo lo que podía pensar era en mi hija. Seguía pensando: “No pueden hacer esto”. No podía entender lo que querían con nuestros hijos. Nadie me decía dónde estaba mi hija o si estaba a salvo. Esos tres días fueron los más difíciles porque no sabía nada.

17. Alrededor del 25 de mayo de 2018, durante una llamada telefónica con mi madre, supe que mi hija estaba en San Benito, Texas. Me sentí un poco aliviada de saber que ella estaba a salvo físicamente, pero todavía estaba desesperada por verla.

18. En lugar de acercarme a mi hija, me habían llevado aún más lejos. Ahora estoy detenida en Washington.

19. Alrededor del 22 de junio de 2018, pude hablar con mi hija por primera vez desde que nos sepáramos, pero solo pude hablar con ella durante aproximadamente un minuto. Ella sollozaba desconsoladamente y no podía hablar. En repetidas ocasiones he llamado a la trabajadora social de mi hija para pedirle que programe las llamadas telefónicas, pero ella nunca contesta el teléfono. Necesito hablar con mi hija con regularidad. Pienso en ella constantemente. Me pregunto si ha hecho amigos, si está comiendo y durmiendo, y si está bien.

20. Desde mi detención, no he recibido ningún asesoramiento o servicios de salud mental para tratar el trauma producido por la separación de mi hija.

21. Por mala que haya sido la detención y la separación para mí, solo puedo imaginar lo malo que ha sido para mi hija. Con base en nuestra llamada telefónica, creo que mi hija ha sufrido mucho debido a nuestra separación y detención, y creo que necesitará mucha ayuda especial para enfrentar el trauma. Ella no tiene ni idea de qué está pasando, por qué nos separaron o por qué estamos detenidas. Está confundida y angustiada, y necesita a su madre.

22. Todo lo que quiero es volver a ver a mi hija. Quiero correr hacia ella y abrazarla. Necesitamos estar juntas fuera de la detención.

Declaro bajo pena de perjurio conforme a las leyes de los Estados Unidos que lo anterior es verdadero y correcto.

Declaración realizada el 11 de julio de 2018 en Tacoma, Washington.



R.M.

DECLARATION OF R.M.

I, R.M., declare and state:

1. I am a Plaintiff in the above-referenced matter. I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently thereto.

2. I am the mother of a 15-year-old daughter, S.Q. I am very close with my daughter, and we have always been together prior to coming to the United States.

3. S.Q. and I fled El Salvador in fear of my ex-husband. My ex-husband, a former military officer with connections to local police, threatened to kill me on several occasions, including once with a gun. He was physically violent towards me, grabbing me by the neck and leaving bruises. He told me that I was his property, and I was not allowed to speak to other people. I am afraid that if I return to El Salvador, my ex-husband will find me and kill me. Since leaving El Salvador, I have received a message from a contact there saying that he is looking for me so that he can kill me.

4. I am also scared of the gangs in El Salvador. One gang member wanted to hurt my daughter and after I confronted him, I was told that the gang would harm my daughter. The gangs resolve everything with killing, and if we return to El Salvador, I am afraid that the gangs will kill us both.

5. On or around May 18, 2018, S.Q. and I entered the United States at the southern Texas border. It was my understanding that the proper way to enter the country was to present yourself to officials and request asylum. S.Q. and I, therefore, waited under a tree for approximately 30 minutes until we saw a patrol car. We flagged down the patrol car, and asked for help. The officer asked if we were ok, and then asked for our name, age, and where we were born. The conversation went smoothly, and we got in the back of the vehicle.

6. We were brought to a station, where we were immediately separated and I was taken to an office room. I was not given any explanation as to where they were taking my daughter, and I was in a moment of panic. I was distracted looking all around to see if I could find my daughter. The officers were asking me questions, but I could not concentrate because I

was trying to see where my daughter was. I do not recall my responses to their questions. I just nodded my head as I scanned the room and looked out the window for my daughter. For a moment, I could see her outside the window. I smile and waved, and pretended to be ok, so that she would not be scared.

7. After I saw her, I turned back to the officers. They started yelling at me, saying that they were going to deport me without my daughter and that I would be punished for exposing my daughter to such a harsh journey. I started crying. One officer said, “You can thank Trump.” I felt like they were pressuring me to sign deportation papers by yelling and asking multiple times, “Are you ready to sign your deportation papers?” They said that I would go to jail if I didn’t sign.

8. I did not sign the deportation papers because I was not going to leave my daughter behind. Two of the officers were laughing at me as I sobbed. I was afraid and disoriented. At the very end of the interrogation, after I would not sign my deportation papers, one officer asked if I was afraid to return to my country. I said yes. This was the very last question that they asked.

9. Afterwards, they took me to a different part of the facility called “La Hielera” (the icebox). It is called “La Hielera” because it is freezing cold. After some time in La Hielera I was taken to another part of the facility called “La Perrera” (the dog house). It is called “La Perrera” because the holding cells resemble dog kennels; cages enclosed by chain-link fences. The conditions were horrible. I was tightly packed into a cage with at least 40 to 50 other women. We sat on the floor shoulder to shoulder. There were no beds or mats, no pillows, and no blankets. We were given paper sheets and we laid on the floor to sleep. There was not enough room on the floor for everyone to lay down without touching. We covered the entire floor. When someone needed to use the toilet, they had to walk over people and tap people on the shoulder to make a small pathway. There was only one toilet in the cage, but it was not enclosed. Women would stand up to create a human wall to give the person some privacy when they used the toilet.

10. The lights were on all day and night, making it almost impossible to sleep. I lost track of time because there was no clock and no windows. I did not know when a day had passed. When a woman asked for the time, a guard mocked her and said, "Why? Do you have an appointment or something?"

11. The food that they gave us was disgusting. Twice a day, they brought us two pieces of soggy bread and a frozen piece of what looked like ham, and one juice box. We were all very hungry. To humiliate us, the guards would open the cage door and throw crackers at us. This caused a lot of mayhem. The women would scramble to pick up the crackers off the floor, and the guards would laugh. I was sitting near the door next to the officer, so I held out my hand for a cracker. The guard said, "Do you want five-star treatment?" He then threw the crackers for me to eat off the floor, saying, "There is your room service."

12. We were not allowed to shower or brush our teeth for four days. They did not give us a change of clothes, and we wore the clothes that we had arrived in. Many women had wet clothes because they had crossed the river to get to the United States. It was so cold that their wet clothes became stiff.

13. From my cage, I could see my daughter in the children's cage. After feeding the children one day, the guard left the children's cage open. As the guard was walking away, my daughter crawled out of the cage and brought me a small bottle of water. Our fingers touched through the chain-linked fence. I told her that everything was going to be ok and that I loved her very much. This was the last time that I touched my daughter.

14. On or around May 21, 2018, I appeared before a judge for my criminal proceedings. I was in a courtroom with over 50 other detainees. We sat in rows of benches facing the judge. We were in shackles and handcuffs, and they gave us headphones for translation. Before the proceedings started, a man in a suit stood up and advised us all to plead guilty. He said that if we pled guilty, then we would get a lower sentence. I think that this man may have been a lawyer, but I am not sure. Every detainee before the judge was asked the same set of questions, and we all pled guilty. There were approximately 25 people ahead of me, and I

answered the same as they did because I thought that was what I was supposed to do. I did not understand the consequences of pleading guilty.

15. After my criminal proceedings, they boarded me on a bus. They did not say where they were taking us, but I later learned that we were headed to Laredo, Texas. Everyone was asking for their children. One guard yelled, "Stop asking about your kids!" All of the women were worried. I was panicking because my daughter was not on the bus and I did not want to be taken away from her. I began to cry uncontrollably because I realized that I was being separated from my daughter and we would not be reunited.

16. For the next three days, I was inconsolable. I got maybe one hour of sleep per night. I could not eat. I could not talk to anyone. All I could think about was my daughter. I kept thinking, "They can't do this." I could not figure out what they wanted with our children. No one would tell me where my daughter was or if she was safe. Those three days were the hardest because I did not know anything.

17. On or around May 25, 2018, I learned during a phone call with my mother that my daughter was in San Benito, Texas. I was somewhat relieved to know that she was safe physically, but still desperate to see her.

18. Instead of getting closer to my daughter, they have taken me even further away. I am now being detained in Washington.

19. On or around June 22, 2018, I was able to speak to my daughter for the first time since we were separated, but I only got to speak with her for about one minute. She was sobbing uncontrollably and could not speak. I have repeatedly called my daughter's social worker asking to set up phone calls, but she never answers the phone. I need to speak with my daughter on a regular basis. I think about her constantly. I wonder if she has made any friends, if she is eating and sleeping, and if she is ok.

20. Since my detention, I have not received any assessment or mental health services for treatment of trauma resulting from the separation from my daughter.

21. However bad the detention and separation have been for me, I can only imagine how bad it has been for my daughter. Based on our phone call, I think that my daughter has suffered greatly due to our separation and detention, and I believe that she will need a lot of special help to deal with the trauma. She has no idea what is going on, why we were separated, or why we are being detained. She is confused and distraught, and she needs her mother.

22. All I want is to see my daughter again. I want to run to her and hug her. We need to be together outside of detention.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signed on this 11th day of July 2018 in Tacoma, Washington.

R.M.



TRANSPERFECT

CERTIFICATION

TransPerfect is globally certified under the standards ISO 9001:2015 and ISO 17100:2015. This Translation Certificate confirms the included documents has been completed in conformance with the Quality Management System documented in its ISO process maps. The English file "Declaration of R.M._EN" is, to the best knowledge and belief of all TransPerfect employees engaged on the project, an accurate reflection of the Spanish file 'Declaration of R.M._ES"

Authorized Signature:

Claire Skrabutena

Executive Project Manager

July 12, 2018

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

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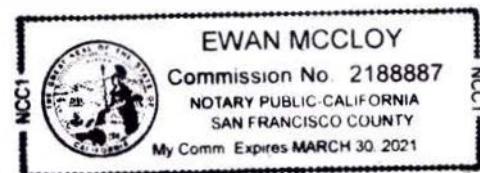
On July 12, 2018 before me, Ewan McCloy, Notary
(Here insert name and title of officer)

personally appeared Claire Skrabutena,
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the
within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized
capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which
the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true
and correct.

WITNESS my hand and official seal.

(Notary Public Seal)



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